



## **PUBLIC DISCLOSURE**

July 24, 2020

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Generations Bank  
718024

19 Cayuga Street  
Seneca Falls, New York 13148

Office of the Comptroller of the Currency

5000 Brittonfield Parkway  
Suite 102B  
East Syracuse, New York 13057

**NOTE:** This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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## Overall CRA Rating

**Institution’s CRA Rating:** This institution is rated Satisfactory.

**The lending test is rated: Satisfactory.**

The major factors that support this rating include:

- The bank had a more than reasonable loan-to-deposit ratio during the evaluation period.
- A majority of the home mortgage loans originated during the evaluation period were within the bank’s assessment area (AA).
- A reasonable geographic distribution of loans among geographies of different income levels based upon a reasonable distribution of home mortgage loans.
- Excellent distribution of loans to individuals of different income levels based upon an excellent distribution of home mortgage loans.

### Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of the AAs, the bank’s loan-to-deposit ratio is more than reasonable.

The loan-to-deposit ratio was calculated using the average quarterly loan-to-deposit ratios beginning from the end of the last evaluation through the end of the current evaluation period, or March 31, 2017, through December 31, 2019. During this period, Generations’ average loan-to-deposit ratio was 94.54 percent. In comparison, the ratio for two similarly situated institutions located in the AA and four similarly sized institutions that operate in counties with similar distribution of income level by census tracts (CT) and median family income ranged between 50.48 percent and 104.79 percent.

### Lending in Assessment Area

A majority of the bank’s loans are inside its AAs. The bank originated and purchased 55.1 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	358	55.1	292	44.9	650	39,259	59.4	26,988	40.6	66,517

Source: 01/01/2017 - 12/31/2019 Bank Data

## Description of Institution

Generations Bank (Gen Bank) is a \$347.8 million intrastate mutual thrift bank headquartered in Seneca Falls, New York (N.Y.). The corporate organization includes a mid-tier holding company, Seneca Cayuga Bancorp, Inc, which is owned by the mutual holding company Seneca Falls Savings Bank (56.6 percent) and public shareholders (43.4 percent). In September 2018, the bank acquired Medina Savings and Loan Association (Medina S&L), a \$52 million state chartered mutual thrift. In November 2018, the bank obtained a charter from the New York State Department of Financial Services for a limited purpose commercial bank to accept municipal deposits, provide a source of earnings, and further develop deposit relationships.

Gen Bank has 10 branch offices and a separate headquarters located across two AA within the Finger Lakes Region and west of Rochester, N.Y. Since the last evaluation, the bank closed a branch in Waterloo, N.Y. (April 2019). Each branch has at least one 24-hour automated teller machine (ATM) and there is a free-standing ATM located in the Seneca County Office Building. The bank acquired two offices through the merger with Medina S&L, both located in Orleans County. The AAs do not arbitrarily exclude any low- or moderate-income areas.

The bank's lending strategy focuses on home mortgage lending, in addition to, offering other noncomplex retail loans and business loan products for consumer and commercial borrowers. As of December 31, 2019, Gen Bank's balance sheet included \$261.6 million in total loans consisting of 58.9 percent secured with residential real estate mortgages, 19.8 percent commercial loans, 17.3 percent consumer loans, and 3.0 percent agricultural loans. Deposits are sourced substantially from the bank's market area.

The bank uses business development officers and branch staff to both directly source and generate mortgage referrals and develop working relationships with realtors and communities of influence (COI). Management has entered into or established programs to promote home loan funding for both low- and moderate-income (LMI) borrowers and to fund home loans in the AA's limited number of LMI CTs. These programs include: United States Department of Agriculture (USDA) loans and the Federal Home Loan Bank's (FHLB) First Home Club grant program. The bank began offering the MyGenMortgage product in 2015, a no-down-payment product, highly attractive for LMI borrowers. However, over the last year the bank limited this product solely to LMI customers. Additionally, in 2018 the bank introduced a no closing cost loan product, which attracts LMI customers. Gen Bank also continues to service Seneca County Habitat for Humanity loans and now, Orleans County Habitat for Humanity. In late 2015, management began working with LendKey and added two student loan products. Management also continues to offer affordable automobile loans targeted to LMI borrowers.

Deposit accounts offered by the bank include various savings accounts (including school and healthcare savings accounts) and checking accounts. The bank also offers retail non-deposit investment products and services.

Gen Bank has no legal, financial or other impediments hindering its ability to help meet the credit needs in its AAs. Gen Bank demonstrated Satisfactory performance at its last CRA evaluation dated July 24, 2017.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The lending test evaluation period covered January 1, 2017, through December 31, 2019 for home mortgage loans. Home mortgage loans include home purchase, home improvement, home mortgage refinance, and multi-family loans as reported on the Loan Application Register (LAR) required by the Home Mortgage Disclosure Act (HMDA).

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact the coronavirus pandemic has had on economies across the United States are not addressed in this evaluation. Bank qualifying activities will be appropriately considered in the subsequent evaluation.

### **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

### **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

Gen Bank’s rating is based on its performance within the state of New York, which consists of two AAs, the Cayuga-Seneca non-MSA AA and the Rochester MSA AA. Examiners gave performance in both AAs equal weight, as the AAs are generally close in originations/purchases, CTs, branches, and population, a shift as a result of the Medina S&L merger.

The MMSA rating and state ratings are based on performance in all bank AAs. Refer to the “Scope” section under each state and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank’s or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution's next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of New York

#### CRA rating for the State of New York<sup>1</sup>: Satisfactory

#### The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- A reasonable geographic distribution of loans among geographies of different income levels based upon a reasonable distribution of home mortgage loans.
- An excellent distribution of loans to individuals of different income levels based upon an excellent distribution of home mortgage loans.

### Description of Institution's Operations in New York

Gen Bank operates in two AAs within the state of New York, the Cayuga-Seneca non-MSA AA and the Rochester MSA AA. The bank has 10 branch offices and a separate headquarters located within the AAs spread across the Finger Lakes Region and west of Rochester, N.Y.

#### Rochester MSA AA

The Rochester MSA AA consists 39 CTs comprised of a portion of the full 40380 Rochester, N.Y. MSA (Rochester N.Y. MSA) and four adjacent CTs within the 15380 Buffalo-Cheektowaga-Niagara Falls, N.Y. MSA (Buffalo N.Y. MSA). Specifically, the AA contains the full county of Orleans and the substantial majority of the county of Ontario in the Rochester N.Y. MSA and four CTs in Niagara County in the Buffalo N.Y. MSA. While the bank does not have branches within the CTs in Niagara County, the branches located in adjacent Orleans County can be reasonably expected to serve the population in those CTs. The four CTs within the adjacent Buffalo N.Y. MSA do not substantially extend beyond the boundaries of the Rochester N.Y. MSA and are demographically similar to the rest of the designated Rochester MSA AA and were therefore combined into a single AA. Five of Gen Bank's 10 branches are in the Rochester MSA AA. The delineation of the AA is based upon the location of these branches. Three Gen Bank branches are in Ontario County in the eastern part of the MSA and two branches, acquired via the 2018 merger with Medina S&L, are in Orleans County in the western part of the MSA. The Medina S&L merger expanded the AA to include Orleans County and a portion of Niagara County. The AA is reasonable and does not arbitrarily exclude low- or moderate-income CTs. The AA includes: seven moderate-income CTs, 27 middle-income CTs, four upper-income CTs, and one unknown. There are no low-income CTs in the AA. Each branch has at least one 24-hour automated teller machine (ATM). Since the last evaluation, the bank closed a branch in Waterloo, N.Y. (April 2019).

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within a MMSA.

The AA includes 71,140 total housing units of which 46,622, or 65.5 percent, are owner-occupied. The remaining units are rental units (16,479, or 23.2 percent) or vacant units (8,039, or 11.3 percent). Owner-occupied housing in moderate-income CTs represents 9.9 percent of owner-occupied housing in the AA. The AA includes 159,664 persons and 41,843 families with a 2019 FFIEC updated MFI of \$75,800. Low- and moderate-income families represent 39.4 percent of all families living in the AA, 20.8 percent low-income and 18.6 percent moderate-income. Low-income families earn less than 50 percent of the MFI, or \$37,900. Moderate-income families earn less than 80 percent of the MFI, or \$60,640, but no less than 50 percent of the MFI. The AA includes 44,533 households, of which 7.8 percent are living below the poverty level. The AA's median housing value is \$133,985 and according to data from the National Association of Realtors, the median 2019 sales price of a one- to four-family home in the AA was \$154,200.

The unemployment rate in the AA, as of December 31, 2019, was 4.3 percent, up somewhat from 4.0 percent, as of December 31, 2018. The unemployment rate for the Rochester MSA AA is consistent, but slightly higher than the overall unemployment rate in New York State of 3.7 percent, for the same period. The largest area employers in the Rochester MSA AA include Finger Lakes Health and Thompson Health in Ontario County and Baxter International and Walmart in Orleans County.

Gen Bank ranks 21<sup>st</sup> for HMDA lending in the AA with a 1.3 percent market share. The top HMDA lenders were ESL Federal Credit Union, Wells Fargo, Community Bank, N.A., and Quicken Loans with 11.0, 5.0 and 4.6 percent market share, respectively. Competition from other financial institutions operating in Rochester MSA AA is significant with over 5,800 HMDA lenders reporting loans in the AA. These include commercial banks, savings banks, federal credit unions and non-bank mortgage companies. As of June 30, 2019, Gen Bank ranks eighth in deposit market share with 3.6 percent. There were 11 FDIC-insured institutions, including Gen Bank, operating in the AA with a total of 39 offices or branches. The institutions with the largest deposit market share were Canandaigua National Bank and Trust Company, Five Star Bank and Community Bank, N.A. with 36.5, 15.2 and 9.5 percent market share, respectively.

The FDIC conducted a community contact in the Rochester MSA AA during the evaluation period. The contact emphasized a need for small business and small farm loans. In addition, they emphasized need for equity investments from venture capitalists for new companies that need capital rather than debt when they are starting out.



<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Rochester MSA AA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	38	0.0	18.4	71.1	10.5	0.0
Population by Geography	159,664	0.0	12.8	72.4	14.8	0.0
Housing Units by Geography	71,140	0.0	14.3	71.2	14.5	0.0
Owner-Occupied Units by Geography	46,622	0.0	9.9	74.4	15.7	0.0
Occupied Rental Units by Geography	16,479	0.0	26.4	58.7	14.9	0.0
Vacant Units by Geography	8,039	0.0	14.6	78.6	6.7	0.0
Businesses by Geography	8,543	0.0	17.9	61.1	21.0	0.0
Farms by Geography	657	0.0	4.4	85.4	10.2	0.0
Family Distribution by Income Level	41,843	20.8	18.6	21.1	39.5	0.0
Household Distribution by Income Level	63,101	22.2	16.1	19.3	42.5	0.0
Median Family Income 40380 Rochester MSA		\$67,757	Median Housing Value			\$133,985
			Median Gross Rent			\$798
			Families Below Poverty Level			8.2%
<i>Source: 2015 ACS Census and 2018 D&amp;B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in New York

Gen Bank's state rating is based on the bank's home mortgage lending activity in both the Rochester MSA AA and the Cayuga-Seneca non-MSA AA. Home mortgage loans was the sole product reviewed by examiners, given its proportion of originations and purchase throughout the evaluation period. Due to the increased activity in the Rochester MSA AA, the OCC completed a full scope review of the Rochester MSA AA and a limited scope review of the Cayuga-Seneca non-MSA AA. As mentioned, Gen Bank expanded the Rochester MSA AA from the prior evaluation when it consisted of only Ontario County, to now include the full county of Orleans, the substantial majority of the county of Ontario, and four CTs in Niagara Country (Buffalo N.Y. MSA).

## LENDING TEST

The bank's performance under the Lending Test in New York is rated Satisfactory.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Rochester MSA AA is reasonable.

## **Distribution of Loans by Income Level of the Geography**

The bank exhibits reasonable geographic distribution of loans in the state.

### ***Home Mortgage Loans***

Refer to Table O in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

The bank exhibits a reasonable distribution of home mortgage loans among geographies of different income levels within the AA. In 2017-2019, the distribution of home mortgages made in moderate-income geographies is near to the percent of owner-occupied housing in moderate-income geographies and aggregate industry distribution. This is considered reasonable as the merger with Medina S&L in 2018 increased the number of moderate-income census tracts in the AA, however, lending activity is primarily in the last year of the evaluation period. During the evaluation period, there were no loans made to low-income geographies as there were no geographies identified as low-income within the bank's AA.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibits an excellent distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table P in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The borrower distribution of home mortgage loans was excellent in the Rochester MSA AA. In 2017-2019, the distribution of home mortgage loans made to low-income borrowers exceeds the aggregate for loans made but is below the percentage of low-income families in the AA. This is still reasonable considering the median housing value of \$133,985 in the AA between 2017 and 2019, it would be difficult for a low-income borrower earning less than \$33,879 to qualify for a home mortgage loan. The distribution of home mortgage loans made to moderate-income borrowers significantly exceeds both the percent of moderate-income families and aggregate industry distribution.

## **Responses to Complaints**

Gen Bank did not receive any CRA related complaints during the evaluation period.

## **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the Lending Test in the Seneca-Cayuga non-MSA AA is consistent with the bank's overall performance under the Lending Test in the full scope area.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope.”

<b>Time Period Reviewed:</b>	01/01/17 to 12/31/19	
<b>Bank Products Reviewed:</b>	Home mortgage loans	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None	N/A	N/A
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>NEW YORK</b>		
Rochester MSA AA (partial)	Full Scope	Includes Ontario County (partial); Orleans County, and Niagara County (partial)
Cayuga Seneca non-MSA AA	Limited Scope	Cayuga and Seneca Counties

## Appendix B: Summary of MMSA and State Ratings

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RATINGS    Gen Bank	
Overall Bank:	Lending Test Rating
Gen Bank	Satisfactory
MMSA or State:	
New York	Satisfactory

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**Consumer Loan(s):** A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

**Full-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

**Geography:** A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

**Home Mortgage Disclosure Act (HMDA):** The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

**Household:** Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

**Low-Income Individual:** Individual income that is less than 50 percent of the area median income.

**Low Income Geography:** A census tract with a median family income that is less than 50 percent.

**Market Share:** The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**Middle-Income:** Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

**Moderate-Income:** Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

**Multifamily:** Refers to a residential structure that contains five or more units.

**Owner-Occupied Units:** Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

**Qualified Investment:** A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Upper-Income:** Individual income that is at least 120 percent of the area median income, or a median family income that is at least 120 percent, in the case of a geography.



## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/assessment area. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography -** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

**Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography**

	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts		
	#	\$	% of Total	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Cayuga-Seneca non-MSA AA	206	22,655	57.5	1.3	0.5	1.5	5.2	5.8	7.1	68.8	69.4	66.5	24.7	24.3	25.0
Rochester MSA AA	152	16,874	42.5	0.0	0.0	0.0	9.9	7.2	8.9	74.4	82.2	71.2	15.7	10.5	19.9
<b>Total</b>	<b>358</b>	<b>39,529</b>	<b>100.0</b>	<b>0.5</b>	<b>0.3</b>	<b>0.3</b>	<b>8.0</b>	<b>6.4</b>	<b>8.3</b>	<b>72.1</b>	<b>72.1</b>	<b>69.6</b>	<b>19.3</b>	<b>18.4</b>	<b>21.6</b>

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0*

**Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower**

	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers		
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Cayuga-Seneca non-MSA AA	206	22,655	57.5	17.1	9.2	6.8	17.0	22.3	20.7	21.8	19.9	24.9	44.1	43.7	37.7
Rochester MSA AA	152	16,874	42.5	20.8	13.8	8.1	18.6	27.0	22.5	21.1	30.3	22.3	39.5	28.3	35.9
<b>Total</b>	<b>358</b>	<b>39,529</b>	<b>100.0</b>	<b>19.3</b>	<b>11.2</b>	<b>7.7</b>	<b>17.9</b>	<b>24.3</b>	<b>21.9</b>	<b>21.4</b>	<b>24.3</b>	<b>23.2</b>	<b>41.3</b>	<b>37.2</b>	<b>36.5</b>

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019 Bank Data, "--" data not available. Due to rounding, totals may not equal 100.0*